

EXHIBIT 12

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

THOMAS BUCHANAN on behalf of himself
and all others similarly situated,

Plaintiff,

v.

SIRIUS XM RADIO, INC.,

Defendant.

Case No.:

17-cv-00728

DECLARATION OF HENRY A. TURNER

Henry A. Turner, pursuant to 28 U.S.C. §1746, deposes and states under penalty of perjury the following:

1. I am a member in good standing of the Georgia State Bar and the Managing Member of Turner Law Offices, LLC, which is Co-Counsel for Plaintiff in this action.
2. I make this declaration in support of Plaintiff's Motion for Class Certification. All the facts stated herein are true and correct and are within my personal knowledge.

3. EDUCATIONAL BACKGROUND

▪ **JURIS DOCTORATE**

Georgia State University College of Law

-Best Oralist: Philip C. Jessup Moot Court Southeastern Regional
Competition

-Board of Trial Advocates Award as Outstanding Student Litigation

- MASTERS OF BUSINESS ADMINISTRATION
(CONCENTRATION: FINANCE)
Georgia State University College of Business Administration
- BACHELOR OF SCIENCE IN BUSINESS ADMINISTRATION
(MAJOR: ACCOUNTING)
University of South Carolina College of Business Administration

4. PROFESSIONAL AFFILIATIONS

- State Bar of Georgia
- Georgia Trial Lawyers Association
- Chartered Financial Analysts Institute
- Atlanta Society of Financial Analysts
- Fellow, Financial Analysts Federation

5. ADMITTED TO PRACTICE

- Supreme Court of Georgia (1991)
- Georgia Court of Appeals (1991)
- U.S. Court of Appeals-Eleventh Circuit (1991)
- U.S. District Court for the Northern District of Georgia (1991)

5. In 27 years as a Trial Attorney I have represented numerous Clients in Class Action Litigation. Since 2004 I have represented Clients in numerous Telephone Consumer Protection Act (TCPA) Class Actions, where I served as Counsel or Co-Counsel, including the following Cases:

- *Martin K. O'Toole et al. v. Pitney Bowes, Inc.*
United States District Court for the Northern District of Georgia
Civil Action File No. 1:08cv1645

- *Anne H. Wallace et al. v. Gregg Appliances, Inc.*
Superior Court of Gwinnett County, Georgia
Civil Action File No. 07-A-05227-4
- *Paul Buck et al. v. Danny Diulus et al.*
Superior Court of Cobb County, Georgia
Civil Action File No. 07-1-10692-18
- *Kimberly Bartlett et al. v. Portfolio Recovery Associates, LLC*
United States District Court for the Northern District of Georgia
Civil Action File No. 1:11cv0624
- *Karen Harvey v. Portfolio Recovery Associates, LLC*
United States District Court for the Middle District of Florida
Civil Action File No. 6:11-cv-00582
- *Denise Baker v. Navient Solutions LLC*
United States District Court for the Eastern District of Virginia
Civil Action File No. 1:17cv1160

6. My Firm has the resources to fulfill its obligations in this Litigation.

7. Neither my Firm nor I have any interest adverse to, or in conflict with, those of the Putative Class in this action.

8. Both my Firm and I are familiar with the obligations and burdens of representing a class and are competent and capable of representing the proposed Class in this case. I am not suffering any impediments and am competent to testify to all of the foregoing.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

FURTHER AFFIANT SAYETH NAUGHT.

January 22, 2018



Henry A. Turner